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UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

ANTONIO S. CAMACHO,

Plaintiff,

vs.

COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS,
MARIANAS PUBLIC LANDS
AUTHORITY, successor to the Marianas
Public Lands Corp., and DEPARTMENT
OF PUBLIC WORKS,

Defendants.

CIVIL ACTION NO. 05-0043

**DEFENDANTS' STIPULATION
REGARDING AND OBJECTIONS
TO PLAINTIFF'S EXHIBITS;
CERTIFICATE OF SERVICE**

Trial: Monday, 4 December 2006
Time: 9:00 a.m.
Judge Hon. Alex R. Munson

COME NOW DEFENDANTS Commonwealth of the Northern Mariana Islands
(CNMI); the former Marianas Public Lands Authority (MPLA) through its successor in

1 interest, the Department of Public Lands (DPL);* and the Department of Public Works
2 (DPW), and make the following stipulation and raise the following objections to Plaintiff's
3 Exhibits.

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5 Defendants stipulate to the authenticity of Defendants' exhibits, that they are true
6 and accurate copies of the originals and that they are what they purport to be.

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8 Defendants reserve the right to make any objections to relevance or admissibility
9 based upon the purpose for which Plaintiff seeks to have the evidence introduced.

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11 For example, Plaintiff's Exhibit 3 is a certification letter for land *exchange*
12 (for other land) whereas Plaintiff is seeking land *compensation* (for cash). [Defendant's
13 Exhibit G is the relevant certification letter, only obtained by Defendant today, not
14 previously provided in discovery because it was in the possession of the Public Auditor
15 (and possibly other investigative agencies) as part of a review of the former MPLA.]

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17 Defendants object to the admission of Plaintiff's Exhibits 24 and 29 as they are just
18 preliminary offers for compensation, they have not yet been accepted yet by the owners,
19 and because they are inadmissible under Federal Rule of Evidence 408 (offers in
20 compromise).

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* Under N. Mar. I. Public Law 15-2, Section 101 (Feb. 22, 2006), available at
24 http://www.cnmilaw.org/pdf/public_laws/15/pl15-02.pdf, most powers and duties assigned
25 to the former Marianas Public Land Authority were assigned to DPL. See Fed. R. Civ. P.
25 25(c) ("action may be continued by or against the original party, unless the court upon
motion directs the person to whom the interest is transferred to be substituted in the
action").

1 Defendants would object to the admission of Plaintiff's Exhibit 5 (appraisal report)
2 without the companion report by the same appraiser from the previous day. However,
3 Defendants have included both reports as Exhibits H and I, respectively.

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5 Respectfully submitted,

6 OFFICE OF THE ATTORNEY GENERAL

7 MATTHEW T. GREGORY # F0205
8 Attorney General

9 Dated: Wednesday, 29 November 2006.

Gregory Baka
10 GREGORY BAKA # F0199
11 Deputy Attorney General

12 Attorneys for Defendants CNMI,
13 former MPLA (DPL), and DPW
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(d), the undersigned declarant states as follows:

1. I am eighteen years of age or older, and I certify that I caused to be served the following document(s) to the last known address(es) listed below on the date(s) indicated.

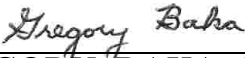
DEFENDANTS' STIPULATION REGARDING AND OBJECTIONS TO PLAINTIFF'S EXHIBITS; CERTIFICATE OF SERVICE

2. As set forth below, this service was accomplished either by personal delivery; U.S. Mail; deposit with the Clerk of Court (in attorney's box), cf. Fed. R. Civ. P. 5(b)(2)(D); or electronic service, see Local Rule 5.1.

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Via Electronic Service

3. I declare under penalty of perjury that the foregoing is true and correct. Executed on Wednesday, 29 November 2006.


GREGORY BAKA # F0199
Deputy Attorney General
Attorney for Defendants CNMI,
former MPLA (DPL), and DPW